Copy of the motion filed with the US Department of Energy on October 29, 2026 (FE Docket No. 20-31-LNG). The text is identical to the filed version.

UNITED STATES OF AMERICA
DEPARTMENT OF ENERGY
OFFICE OF FOSSIL ENERGY AND CARBON MANAGEMENT

In the Matter of: **EPCILON LNG LLC** Request for Extension of Export Commencement Deadline (Order No. 4629)	**FE Docket No. 20-31-LNG**

MOTION FOR LEAVE TO INTERVENE OUT OF TIME AND PROTEST OF THE SEA OF CORTEZ CITIZENS' ALLIANCE

Pursuant to 10 C.F.R. §§ 590.303 and 590.304, the Sea of Cortez Citizens' Alliance ("the Alliance" or "Movant") respectfully moves for leave to intervene out of time in this proceeding and protests the request of Epcilon LNG LLC ("Epcilon"), dated December 12, 2025 and filed December 15, 2025, to extend the export commencement deadline in DOE/FE Order No. 4629 from December 8, 2027 to December 8, 2029 (the "Request"), noticed at 90 Fed. Reg. 60084 (Dec. 23, 2025).

Summary of grounds

1. **The exports would leave through a World Heritage Site that UNESCO has placed "In Danger."** Every cargo authorized by Order No. 4629 would be loaded at Guaymas, Sonora, and carried through the Gulf of California, whose islands and protected areas are a UNESCO World Heritage Site on the List of World Heritage in Danger. In July 2026 the World Heritage Committee kept the site on that List and asked Mexico to "avoid approving any activities that would negatively impact" its Outstanding Universal Value. The United States, the first nation to ratify the World Heritage Convention, has undertaken not to take deliberate measures that might damage World Heritage in another State Party, and Congress has directed federal agencies to take into account the effects of undertakings abroad on World Heritage properties. Mexico told UNESCO in 2026 that the gas projects in the region "remain suspended due to legal challenges"; Epcilon told DOE it has "secured all material permits" (Section I).
2. **Epcilon has not shown good cause.** Its filings omit the Mexican court orders that halted the project, every announced investment decision has been missed, and it has neither contracted gas supply nor a pipeline (Sections V and VI.A–F).
3. **The project is described in irreconcilable terms, and its owners are unknown.** The project operates through at least nine related entities in the United States, Singapore and Mexico whose shareholders, controlling shareholders and financial backers have never been disclosed (Sections VI.G–J; Annexes J and K).

The Alliance asks DOE to deny the Request or, at a minimum, to hold it in abeyance and require full sworn disclosure before acting (Section VII).

I. The Gulf of California: a World Heritage Site in Danger

A. UNESCO and the World Heritage Convention. The United Nations Educational, Scientific and Cultural Organization (UNESCO) is a specialized agency of the United Nations, established by a Constitution done at London on November 16, 1945, and headquartered in Paris. Its purpose is "to contribute to peace and security by promoting collaboration among the nations" through education, science and culture (Constitution, Art. I(1)). The Convention Concerning the Protection of the World Cultural and Natural Heritage, adopted on November 16, 1972, recognizes that parts of the world's heritage "are of outstanding interest and therefore need to be preserved as part of the world heritage of mankind as a whole" (Preamble), and that such heritage "constitutes a world heritage" which "the international community as a whole" has a duty to protect (Art. 6(1)). The World Heritage Committee, established under the Convention (Art. 8(1)), inscribes on the World Heritage List properties of "Outstanding Universal Value," meaning significance "so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity" (Operational Guidelines, para. 49), and keeps a List of World Heritage in Danger for properties "threatened by serious and specific dangers" (Art. 11(4)). The International Union for Conservation of Nature (IUCN) advises the Committee on natural sites (Art. 8(3)).

B. The Gulf of California site. In 2005 the Committee inscribed the "Islands and Protected Areas of the Gulf of California" (Decision 29 COM 8B.9). The property comprises 244 islands, islets and coastal areas and nine protected areas, about 1.84 million hectares, and meets three natural criteria: (vii) striking natural beauty; (ix) outstanding ecological processes; and (x) its importance as a global priority for biodiversity conservation. UNESCO records that the site holds 39 percent of the world's marine mammal species and a third of its cetacean species, and 891 fish species, 90 of them endemic, and identifies "developments outside the protected areas" as the main challenge to its marine and coastal integrity. UNESCO notes that the Gulf was "famously dubbed the 'Aquarium of the World'," a description widely attributed to Jacques-Yves Cousteau.

C. The site is "In Danger," and UNESCO has asked Mexico to assess LNG projects and not to approve harmful activities. The Committee inscribed the site on the List of World Heritage in Danger in 2019, finding that illegal fishing, which threatens the imminent extinction of the vaquita, "represents an ascertained danger" to the property's Outstanding Universal Value ("OUV") and integrity (Decision 43 COM 7B.26). In July 2025 (Decision 47 COM 7A.5) and again in July 2026 (Decision 48 COM 7A.44) the Committee retained the site on that List. In its 2026 decision the Committee noted "with concern" third-party concerns "regarding an alleged planned expansion of several liquefied natural gas (LNG) projects in the vicinity of the property," and requested Mexico to: (11.1) "provide details of any projects planned within the property or in its wider setting that have the potential to impact the OUV"; (11.2) ensure that their potential impacts, "including the marine biodiversity and ecosystems," are assessed through an Environmental and Social Impact Assessment "before making any decision that would be difficult to reverse"; and (11.3) "avoid approving any activities that would negatively impact the OUV." Mexico's next state of conservation report is due February 1, 2027 (para. 12).

D. What Mexico told UNESCO contradicts what Epcilon told DOE. The 2026 decision records that "infrastructure projects for the development and transport of natural gas in the northwest of the country remain suspended due to legal challenges," and that Mexico "will inform the World Heritage Centre of details including possible impacts on the OUV once there is more certainty" (para. 10). Mexico's own state of conservation report of January 2026 likewise states that these processes "remain suspended due to various legal challenges." Six months later Epcilon told DOE that the project "has secured all material permits and approvals" in Mexico (July 24, 2026). No World Heritage impact assessment of the project appears in the public record.

E. The commitments of the United States. The United States ratified the World Heritage Convention on December 7, 1973, the first State to do so. Under Article 6(3), each State Party "undertakes not to take any deliberate measures which might damage directly or indirectly the cultural and natural heritage … situated on the territory of other States Parties." Mexico has been a State Party since February 23, 1984. The United States has announced its withdrawal from UNESCO effective December 31, 2026, but the Convention is a separate treaty. Explaining the earlier US withdrawal from UNESCO, the National Park Service stated that "the Convention is a stand-alone international legal instrument." The Alliance is aware of no denunciation of the Convention by the United States under its Article 35. The Alliance does not contend that Article 6(3) by itself bars the authorization; it asks DOE to treat this treaty commitment as a matter bearing on the public interest.

F. The National Historic Preservation Act requires DOE to take the site into account. Section 402 of the National Historic Preservation Act, as amended in 1980 and codified at 54 U.S.C. § 307101(e), provides that "[p]rior to the approval of any undertaking outside the United States that may directly and adversely affect a property that is on the World Heritage List," the head of a federal agency "having direct or indirect jurisdiction over the undertaking shall take into account the effect of the undertaking on the property for purposes of avoiding or mitigating any adverse effect." An "undertaking" is "a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency," including those "requiring a Federal permit, license, or approval" (54 U.S.C. § 300320). Order No. 4629 authorizes the re-export of LNG from Guaymas, and the requested extension is the federal approval on which those exports depend. The statute refers to "a property that is on the World Heritage List," without limitation to cultural properties. Federal courts have applied this provision to an agency's approvals abroad. In *Okinawa Dugong v. Gates*, No. C 03-4350 MHP (N.D. Cal. Jan. 24, 2008), the court held that "take into account" requires the agency, at a minimum, to identify the protected property, gather and weigh information, determine whether there will be an adverse effect and consider mitigation; that the duty "lies with" the federal agency; and that the statute compels a particular process, not a particular result. The Ninth Circuit held that such claims may be heard (*Center for Biological Diversity v. Mattis*, No. 15-15695 (9th Cir. Aug. 21, 2017)) and later held that the process includes reasonable consultation with outside entities (*Center for Biological Diversity v. Esper*, 958 F.3d 895 (9th Cir. 2020)). The Alliance respectfully submits that § 307101(e) applies to the approval requested here. The record contains no such process for this property.

G. IUCN has called on the United States to act. In October 2025 the IUCN World Conservation Congress adopted Resolution 8.031, "Protecting the Gulf of California World Heritage Sites of Mexico from industrialisation for liquefied natural gas development." In its preamble it expresses concern that the planned LNG export projects "would result in increased commercial and LNG vessel traffic with significant adverse impacts," and it "calls on the Governments of Mexico and the United States of America to ensure the implementation of the precautionary principle, to oppose and, where necessary, reconsider actions permitting LNG industrialisation" of the Gulf. The resolution is a decision of IUCN's Members, adopted without prejudice to IUCN's technical advice to the Committee.

H. The effects on the site's wildlife. Order No. 4629 authorizes exports whose only route to market is by LNG carrier through the Gulf. The project's Mexican environmental authorization reportedly bars marine works from December to April and caps traffic at about 60 LNG carriers a year (Expansión, Oct. 8, 2026). The Gulf holds a resident population of about 730 fin whales, genetically isolated from the rest of the North Pacific, for which ship strikes are a recognized threat (Rivera-León et al., *Scientific Reports*, 2019); blue and humpback whales use the Gulf from about November to May; and the probability that a ship strike is lethal rises steeply with speed, approaching certainty above 15 knots (Vanderlaan and Taggart, *Marine Mammal Science*, 2007), while LNG

carriers typically operate near 19.5 knots (Universidad Autónoma de Baja California Sur, 2025). Researchers at the Universidad Autónoma de Baja California Sur report that no ship-strike risk model exists for the Gulf (2025). Isla San Pedro Nolasco, about 15 km off San Carlos and Guaymas, is reported to host a California sea lion colony, and the Guaymas Basin hydrothermal vents, a federal marine sanctuary, lie in the central Gulf. A table of protected species and habitats along the route, with sources, is at Annex L, and the key texts of the Convention, the Committee's decisions, the IUCN resolution and the statute are at Annex M.

I. What the Alliance asks DOE to do. The Alliance does not ask DOE to apply Mexican law or to review Mexico's permits. It asks DOE, in deciding whether Epcilon has shown good cause and whether the extension is consistent with the public interest under Section 3(a) of the Natural Gas Act, to take into account that the extension would keep alive exports through a World Heritage Site in Danger, contrary to the Committee's express requests; to carry out the process that 54 U.S.C. § 307101(e) requires before approving the extension; and not to make a decision that would be difficult to reverse before the impact assessment the Committee has requested exists. The Natural Gas Act does not define the public interest. The Alliance recognizes that Order No. 4629 found construction in Mexico to be beyond the scope of DOE's review under NEPA; Section 402 is a distinct statutory duty, and to the Alliance's knowledge the effects on a World Heritage Site in Danger have not been considered in this docket.

II. Communications and service list

The Alliance requests that the following persons be placed on the official service list: Lic. Ricardo Sevilla, Legal Representative, Sea of Cortez Citizens' Alliance, RS@seaofcortezalliance.com; and Sea of Cortez Citizens' Alliance, info@seaofcortezalliance.com.

III. Movant and its interest

The Sea of Cortez Citizens' Alliance is the voice of all who care about the future of the Sea of Cortez. It is a recently formed US nonprofit organization that represents the interests of common citizens from all over the world who care deeply about the Sea of Cortez. It works alongside Mexican and international organizations that share the same goal: to protect this pristine marine habitat from large industrial projects that put it at risk, so that this Eden of the seas endures for generations to come. Its members and supporters live along, work on and navigate the Gulf of California, including its waters off Guaymas through which every cargo under Order No. 4629 would pass. The Alliance has no commercial interest in this proceeding and receives no funding from any company involved in it. Its members would be directly affected by DOE's decision, and no other party represents these interests: the docket shows no intervenor in this proceeding.

IV. Good cause for intervention out of time

The Alliance acknowledges that the deadline for interventions and comments was January 22, 2026. Good cause exists under 10 C.F.R. § 590.303(d) because the material facts on which this protest rests arose after that date and could not have been presented earlier:

1. On May 27, 2026, in an amparo brought by Nuestro Futuro A.C. and Artículo 19, a federal judge in Sonora granted a definitive suspension barring ASEA from issuing any environmental authorization for the project; on September 18, 2026, after the amparo was extended to the environmental authorization dated April 13, 2026, the court granted a second definitive suspension under which no land or marine works may begin. On October 13, 2026, in a separate amparo brought by the Centro Mexicano de

Derecho Ambiental (CEMDA), a federal court found that ASEA had failed to comply with a suspension and ordered it to declare the authorization void; ASEA has announced an appeal (recurso de queja).

2. On July 24, 2026, Epcilon filed supplemental information, on which DOE did not invite comment, stating that "Amigo LNG has secured all material permits and approvals required from SEMARNAT, ASEA, SENER and CNE in Mexico."
3. In July 2026 the World Heritage Committee retained the Gulf of California on the List of World Heritage in Danger and asked Mexico to avoid approving activities that would harm it (Section I).
4. On October 14, 2026 the Government of Sonora stated that the 2022 land contract for the project site had been "left without legal effect" by subsequent legal acts, which it did not identify; on October 18 and 21, 2026 the company and Mexico's Energy Secretary gave the public irreconcilable descriptions of the project; and on October 23–27, 2026 fishing cooperatives of Guaymas and Empalme stated that they had not been consulted.

The court facts above are drawn from public reports and from statements of the parties; ASEA has stated publicly that the court decided the principal case on May 29, 2026 and that it is appealing the October 13 order, and the Alliance has not been able to obtain the court records. DOE has granted late intervention where new information arose after the deadline, limited to the issues raised by that information (*Alaska LNG Project LLC*, DOE/FECM Order No. 3643-C, at 19–22 (Apr. 13, 2023), where the new information was DOE's own draft environmental study). DOE has not acted on the Request. The Alliance accepts the record as it stands (10 C.F.R. § 590.303(h)) and seeks no delay. Its protest rests principally on the new information described above, which also shows why the earlier record, summarized in Section VI, must be read differently. If DOE declines to grant intervention, the Alliance respectfully asks that this filing be considered as information bearing on the accuracy of the applicant's filings and on the public interest. A chronology of the public record, with sources, is at Annex I.

V. The applicable standard

DOE rescinded its 2023 Policy Statement on Export Commencement Deadlines effective April 2, 2025, and now grants extensions "for good cause shown on a case-by-case basis" (90 Fed. Reg. 14411 (Apr. 2, 2025)). Applying that standard, DOE has asked whether the holder "made good faith efforts to progress the Project to meet its existing deadline," whether it was prevented by circumstances outside its control, and has treated the extension of the facility's construction authorization as "a compelling factor" (*Lake Charles LNG*, Order Nos. 3868-E/4010-E, at 33–36 (Aug. 22, 2025)). Epcilon's record shows neither.

VI. Protest

A. Epcilon's filings omit material facts and are unverified. The July 24, 2026 supplement asserts that the project "has secured all material permits and approvals," yet omits the May 27, 2026 judicial suspension, which had been publicly reported (Argus, July 2026). Epcilon's October 2026 semi-annual report omits both the May and September 2026 suspensions and describes the environmental authorization as approved without qualification. The supplement bears no oath or affirmation (10 C.F.R. § 590.103(b)) and should be given no weight. Further, ASEA told a Mexican court on May 20, 2026 that it had not granted an environmental authorization, although the authorization relied on is dated April 13, 2026 (Expansión, Oct. 8, 2026).

B. The record shows a project that has repeatedly missed its own milestones. Across Epcilon's filings with DOE the expected first-export date has moved in nearly every successive report, from October 1, 2024 to October 1, 2029. Its October 2025 report already placed first export after the December 8, 2027 deadline, two

months before the Request was filed. Final investment decision ("FID") targets announced for February 2023, July and August 2024, late 2025 and August 2026 have all passed without FID. No lender, export credit agency or equity investor has been publicly named. This is not a good-faith effort frustrated by external events.

C. The schedule cannot be met even on Epcilon's own terms. Epcilon states that it needs "approximately thirty-four (34) months following FID" to construct the facility. Its latest report targets first export on October 1, 2029, about two months before the extended deadline it requests, although no FID has been taken, construction is barred by court order, and the environmental authorization reportedly bars marine works from December to April each year.

D. There is no factor comparable to an extended construction authorization. The closest analogue to the FERC authorizations on which DOE has relied in recent extensions is the project's Mexican environmental authorization, which is suspended and has been ordered set aside. Epcilon reported to DOE a 30-year "Land Lease and Use permit" from the State of Sonora; the Sonora contract is reported to run only until September 13, 2027 (N+, Oct. 14, 2026), and the State says it has been "left without legal effect."

E. The project has no contracted gas supply and no pipeline. The Request describes gas supply agreements as "ready for execution" and identifies no pipeline or border crossing, and DOE's public summary of supply contracts for this docket contains no entries. The plan for gas supply has changed repeatedly: the Trans-Pecos route (2020), an existing pipeline "next to the Port of Guaymas" (2022), a memorandum with CFEnergía (2024), a letter of intent with an unnamed Texas entity (2025) and, in 2026, a proposed 311-mile Cenagas pipeline with no named builder, cost or schedule. IEEFA reports that the existing Sásabe–Guaymas pipeline, whose full capacity is controlled by Mexico's Federal Electricity Commission (CFE), has a maximum capacity of 812 MMcf/d, about 300 MMcf/d short of what Amigo LNG and four Sonoran power plants would need (IEEFA, Mar. 26, 2026).

F. Epcilon has not complied with the contract-filing condition. Ordering Paragraph I of Order No. 4629 requires that non-redacted copies of all executed long-term contracts "must be filed within 30 days of their execution." On the dates shown on DOE's contracts page and in Epcilon's filing letters, the OQ Trading agreement was filed 165 days after execution, the Sahara Energy Resource agreement 133 days, the OQ amendment 140 days, the Macquarie agreement 37 days and the IRH Global Trading agreement 39 days after execution. These lapses bear on good faith.

G. The public record describes materially inconsistent versions of the project.

- *Capacity.* Order No. 4629 rests on about 7.8 Mtpa. The project's Mexican environmental impact statement (September 2025) describes 5.1 Mtpa and withholds location and layout maps as "reserved information." Public statements put the first train at between 3.6 and 6 Mtpa.
- *Storage.* Order No. 4629 describes two onshore tanks of 230,000 m³ and 170,000 m³ (400,000 m³). Epcilon's semi-annual reports later describe 225,000 m³ and then 450,000 m³. On October 18, 2026 a company slide, shown in a presentation led by its chief executive, described 822,000 m³ (Meganoticias); on October 21, 2026 Mexico's Energy Secretary described "up to 290,000 m³" (Tribuna).
- *Design.* The project has moved from onshore tanks to floating liquefaction and storage units, yet the Request states that it does not seek any modification to the scope, configuration or nature of the project.
- *Vessel traffic.* The Mexican authorization reportedly caps traffic at about 60 LNG carriers a year. Assuming a typical cargo of about 77,000 tonnes (174,000 m³), 60 carriers would carry about 4.6 Mtpa;

7.8 Mtpa would require about 101 carriers a year. Mexico's Energy Secretary described the 60 carriers as about 4 percent of the vessels that already transit the area.

- *Cost.* Public estimates of the project's cost range from about US$2.1 billion to US$6.8 billion.

DOE should not extend an authorization for a project whose size, storage, design and vessel traffic are described in irreconcilable terms, and should at minimum require Epcilon to state under oath which project it intends to build.

H. Affected communities have not been consulted. Fishing cooperatives of Guaymas and Empalme stated on October 23–27, 2026 that neither the developer nor any authority had consulted them since the project was announced, and that the project could aggravate a crisis in the sector (Mural Sonorense, Oct. 27, 2026; Dossier Político, Oct. 26, 2026). Epcilon's filings identify no social impact assessment or community consultation.

I. Broad public opposition. On September 23, 2026, 101 Mexican and international scientists published a statement titled "A Direct, Existential, and Unacceptable Risk: More Than 100 Mexican and International Scientists Oppose LNG in the Gulf of California," which names Saguaro LNG and AMIGO LNG, at Guaymas, as projects of particular concern (nrdc.org/sites/default/files/2026-09/NRDC_NoLNG_scientists.pdf, with the full list of signatories). Nine UN Special Rapporteurs wrote to Mexico and to the companies in September 2025. Mexico Business News reports that more than 4,800 public comments were submitted in the project's Mexican environmental review. Organizations and communities in Mexico and the United States that have publicly opposed the project are listed at Annex F, and the public legal actions in Mexico at Annex H. These organizations are not parties to this filing.

J. The owners of the authorization holder and of the project entities are not disclosed, and the record describes their relationships inconsistently. The public record identifies: Epcilon LNG LLC (Texas), the authorization holder; LNG Alliance Pte. Ltd. (Singapore), the developer; AMIGO LNG Pte. Ltd. (Singapore), shown in Epcilon's 2020 organizational chart; AMIGO LNG, S.A. de C.V. (Mexico), the seller under every sale and purchase agreement filed with DOE and, per Epcilon's filings, the holder of the SENER export permit, the Sonora land contract and the maritime concession, whose counsel verified the Request; its subsidiaries AMIGO FLNG Barge Facility, AMIGO LNG Storage, AMIGO Maritime Facilities and AMIGO LNG Operations (Mexico); and Freedom LNG LLC (Texas), which signed the February 2026 memorandum with Cenagas for the feed-gas pipeline and has its own application before DOE for a separate project (FE Docket No. 26-127-LNG). The same person, Muthu Chezhian, signs as president for Epcilon and Freedom LNG and is described as chief executive of LNG Alliance, and the same counsel appears in both dockets. An organizational chart and trace of these entities, with sources, is at Annex K.

The record describes the relationship between these entities in at least five ways: AMIGO LNG, S.A. de C.V. as an affiliate of Epcilon "through common ownership" (2020), a subsidiary of LNG Alliance (2024–2025), a joint venture of Epcilon and LNG Alliance (from August 2025), a subsidiary of Epcilon (December 2025), and a project operating "through its parent company Epcilon LNG LLC" (company website). Epcilon's 2020 organizational chart shows ownership interests of 100, 90 and 10 percent without identifying the holders. The Request refers to "U.S. investor participation," the chief executive has said that the project's institutional investors "are from the U.S." (Hart Energy, 2022), and in April 2026 the press reported, from the company, that the project had secured equity investors and that its debt financing was oversubscribed (bne IntelliNews, Apr. 19, 2026). Yet no investor has been named and no notice of a change in control appears on the docket. If equity investors have joined the project since Order No. 4629 was issued, DOE should require Epcilon to state whether

any of them holds, directly or indirectly, 10 percent or more of the voting interests in the authorization holder or its parents. The land is also described inconsistently: a 30-year land right reported to DOE, a contract reported to expire on September 13, 2027, and a State statement that it has no legal effect; and by decree of January 21, 2026 (Boletín Oficial de Sonora, Jan. 22, 2026) the State donated about 114 hectares in the same Guaymas industrial fishing park to the Federal Government for the Navy, which press analysis suggests may include the land loaned to the developer.

DOE's Change in Control Procedures establish a rebuttable presumption that control exists where an entity has the power to vote, directly or indirectly, 10 percent or more of the voting securities of the authorization holder, and require the holder to notify DOE of any change in control (79 Fed. Reg. 65,541 (Nov. 5, 2014)); Ordering Paragraph N of Order No. 4629 requires Epcilon to comply with those procedures. DOE cannot assess good cause, or the public interest, without knowing who owns and controls the holder of this authorization and every entity through which the project is permitted, contracted, financed and operated. In FE Docket No. 18-70-LNG, DOE asked Mexico Pacific to identify "the three minority investors that each hold 10% of the economic interest in" its parent company, MXP Holdings (Oct. 29, 2025), and found it "necessary to delay review" of Mexico Pacific's extension application until that proceeding concludes (Dec. 12, 2025). The same scrutiny is warranted here, on the same basis: in Mexico Pacific the existence of the investors whose 10 percent stakes prompted DOE's review was known; here the developer's new equity investors have been reported publicly while none has been disclosed to DOE.

VII. Relief requested

The Alliance respectfully requests that DOE: (1) grant it leave to intervene out of time and accept this protest; (2) deny the Request; or, in the alternative, (3) hold the Request in abeyance and, under 10 C.F.R. § 590.202(d), require Epcilon to file under oath: (a) all Mexican court orders and pending litigation affecting the project; (b) the status of its environmental authorization, land rights and maritime concession, with the holder, number and date of each Mexican permit, concession and land right; (c) its executed gas supply and transportation agreements; (d) its financing; (e) the current design, capacity and storage of the facility and its expected annual number of LNG carrier transits; (f) an assessment of the effects of those transits on the Outstanding Universal Value of the Islands and Protected Areas of the Gulf of California and on the species listed at Annex L, and the measures it would adopt to avoid or mitigate them; (g) full disclosure of all shareholders and members, with their percentages, and of every controlling shareholder, holding directly or indirectly any equity or voting interest in Epcilon LNG LLC, LNG Alliance Pte. Ltd., AMIGO LNG Pte. Ltd., AMIGO LNG, S.A. de C.V. and each of its subsidiaries, Freedom LNG LLC and any other affiliate that holds land, concessions, permits, gas or sales contracts for the project, including at a minimum every holder of 10 percent or more and every natural person who ultimately owns or controls each entity, with their directors and officers and a chart of the corporate relationships among them; and (h) any change in ownership or control since Order No. 4629 was issued; and (4) before approving any extension, carry out the process required by 54 U.S.C. § 307101(e): identify the World Heritage property, gather and weigh information on the effects of the authorized exports and their LNG carrier traffic, determine whether they will adversely affect the property, and consider alternatives and mitigation, in reasonable consultation with the National Park Service Office of International Affairs, the Department of State, the World Heritage Centre and IUCN; (5) not make a decision that would be difficult to reverse before the Environmental and Social Impact Assessment requested by the World Heritage Committee (Decision 48 COM 7A.44, para. 11.2) exists and Mexico's state of conservation report due February 1, 2027 is available; and (6) in any event, not grant an extension longer than the record supports, and condition any extension on timely disclosure of these matters.

Respectfully submitted,

/s/ Ricardo Sevilla
Lic. Ricardo Sevilla
Legal Representative
Sea of Cortez Citizens' Alliance / Alianza Ciudadana por el Mar de Cortez
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Dated: October 29, 2026

Verification

I, Ricardo Sevilla, Legal Representative of the Sea of Cortez Citizens' Alliance, state that I am authorized to make this verification on its behalf; that I have read the foregoing Motion in its Spanish version, which is a faithful translation of this English text; and that the facts stated in it are true to the best of my knowledge, information and belief, being drawn from the public sources cited. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Ricardo Sevilla
Ricardo Sevilla, Legal Representative · October 29, 2026

Certificate of service

I certify that on October 29, 2026 I served the foregoing document by electronic mail upon Epcilon LNG LLC at its contact of record, Muthu Chezhian, President, Epcilon LNG LLC, 7818 Element Ave., Plano, Texas 75024 (mc@lngalliance.com), and upon each person on the official service list in this proceeding, in accordance with 10 C.F.R. §§ 590.107 and 590.304(d).

/s/ Ricardo Sevilla
Ricardo Sevilla, Legal Representative · October 29, 2026

Attachments (included in this filing): Annex F, organizations that have publicly opposed the project; Annex H, public legal actions in Mexico; Annex I, chronology of the public record; Annex J, summary of the public record; Annex K, organizational chart and trace of entities; Annex L, protected species and habitats along the route; Annex M, key texts of the World Heritage Convention, the World Heritage Committee decisions, IUCN Resolution 8.031 and 54 U.S.C. § 307101(e). Other public sources are identified in the text and in the list below by their public addresses; Epcilon's own filings are in this docket. Organizations listed in Annexes F and H are not parties to this filing.

Principal public sources (plain text, as required by the notice): Order No. 4629: energy.gov/sites/prod/files/2020/12/f81/ord4629.pdf · DOE docket 20-31-LNG: energy.gov/fe/articles/epcilon-lng-llc-fe-dkt-no-20-31-lng · UNESCO site page: whc.unesco.org/en/list/1182 · Decision 48 COM 7A.44: whc.unesco.org/en/decisions/9033 · World Heritage Convention: whc.unesco.org/en/conventiontext · Decision 47 COM 7A.5: whc.unesco.org/en/decisions/8672 · Decision 43 COM 7B.26: whc.unesco.org/en/decisions/7490 · Mexico state of conservation report (Jan. 2026): whc.unesco.org/document/224542 · NPS, US withdrawal from UNESCO Q&A: nps.gov/subjects/internationalcooperation/unesco-q-a.htm · IUCN Resolution 8.031: portals.iucn.org/library/sites/library/files/resrecfiles/WCC_2025_RES_031_EN.pdf · 54 U.S.C. § 307101(e): govinfo.gov/link/uscode/54/307101 · 90 Fed. Reg. 14411 (Apr. 2, 2025) · 79 Fed. Reg. 65,541 (Nov. 5, 2014) · Lake Charles LNG, Order Nos. 3868-E/4010-E (Aug. 22, 2025) · Alaska LNG, Order No. 3643-C (Apr. 13, 2023) · Scientists' statement (Sept. 23, 2026): nrdc.org/sites/default/files/2026-09/NRDC_NoLNG_scientists.pdf · MXP information request (Oct. 29, 2025): energy.gov/sites/default/files/2025-10/MXP Request for Information CIC Proceeding.pdf · Expansión, Oct. 8, 2026 · IEEFA, Mar. 26, 2026: ieefa.org/resources/amigo-lng-export-project-thats-running-out-gas · Rivera-León et al., Scientific Reports (2019) · Vanderlaan and Taggart, Marine Mammal Science (2007).

Annex F. Organizations and groups that have publicly opposed Amigo LNG or LNG in the Gulf

Compiled from public records, each linked to its source. These organizations are not parties to this filing, and the Alliance does not speak for them.

Organization	Country	Public position or action	Source
Nuestro Futuro A.C.	Mexico	Petitioner (with Artículo 19) in the amparo in which definitive suspensions were granted on May 27 and Sept. 18, 2026	https://noro.mx/accion-social/suspension-definitiva-amigo-gnl-guaymas/
Artículo 19 México	Mexico	Co-petitioner in the same amparo	https://articulo19.org/juzgados-de-sonora-dan-suspension-a-autorizacion-de-impacto-ambiental-de-amigo-gnl-hasta-que-se-resuelva-juicio-por-falta-de-acceso-a-informacion-y-participacion-ciudadana/
Centro Mexicano de Derecho Ambiental (CEMDA)	Mexico	Petitioner in the separate amparo in which a federal court, on Oct. 13, 2026, ordered ASEA to declare the environmental authorization void; co-movant in the DOE protest against Mexico Pacific's extension (18-70-LNG, Aug. 2025)	https://www.excelsior.com.mx/nacional/poder-judicial-ordena-asea-dejar-sin-efecto-autorizacion-ambiental-proyecto-amigo-lng-1
Defensa Ambiental del Noroeste (DAN)	Mexico	Co-petitioner (with ProDESC) in the amparo seeking a strategic environmental assessment of LNG in the Gulf; signatory of the July 15, 2025 alert to UNESCO, IUCN and Ramsar	https://grupoanimal.mx/sociedad/golfo-california-proyectos-gas-licuado-asea-semarnat
ProDESC	Mexico	Co-petitioner in the strategic environmental assessment amparo	https://grupoanimal.mx/sociedad/golfo-california-proyectos-gas-licuado-asea-semarnat
¿Ballenas o Gas? (30+ organizations)	Mexico	Public petition and campaign against Amigo LNG and Saguaro LNG	https://diariodelyaqui.mx/sonora/amigo-gnl-no-es-amigo-es-enemigo-reunen-firmas-contra-proyecto-de-gas-fosil-en-guaymas/135710
Conexiones Climáticas	Mexico	Member of ¿Ballenas o Gas?; documentary "Whales or Gas?" (Oct. 2026)	https://whalesorgas.org/
Greenpeace México	Mexico	Campaign against LNG exports through the Gulf, supported by more than 215,000 people	https://www.greenpeace.org/mexico/noticia/54969/mas-de-215-mil-personas-prefieren-a-las-ballenas-no-a-la-exportacion-del-gas-por-el-golfo-de-california/
Natural Resources Defense Council (NRDC)	United States	Open letter opposing Amigo LNG (July 29, 2026); publisher of the scientists' statement; co-movant against Mexico Pacific at DOE	https://www.nrdc.org/bio/joel-reynolds/lng-aquarium-world-direct-existential-and-unacceptable-risk
Earthjustice	United States	Works with Mexican groups against Gulf LNG	https://earthjustice.org/article/protecting-the-aquarium-of-the-world-from-a-gas-industry-takeover
Center for Biological Diversity	United States	Signatory of the July 15, 2025 alert naming Amigo LNG	https://www.nrdc.org/sites/default/files/2025-08/gulf_lng.Urgent_Alert_UNESCO-IUCN-RAMSAR.july_15_2025.pdf
Public Citizen and Sierra Club	United States	Signatories of the July 15, 2025 alert; protested Mexico Pacific's extension and ownership at DOE (Aug. and Dec. 2025)	https://www.nrdc.org/sites/default/files/2025-08/gulf_lng.Urgent_Alert_UNESCO-IUCN-RAMSAR.july_15_2025.pdf
IEEFA	United States	Analysis "Amigo LNG: An export project that's running out of gas" (Mar. 26, 2026)	https://ieefa.org/resources/amigo-lng-export-project-thats-running-out-gas
IUCN World Conservation Congress	International	Resolution 8.031 (Oct. 2025) calling on Mexico and the United States to oppose LNG industrialization of the Gulf	https://portals.iucn.org/library/sites/library/files/resrecfiles/WCC_2025_RES_031_EN.pdf
101 Mexican and international scientists	International	Statement "A Direct, Existential, and Unacceptable Risk" (Sept. 23, 2026)	https://www.nrdc.org/sites/default/files/2026-09/NRDC_NoLNG_scientists.pdf
Fishing cooperatives of Guaymas and	Mexico	Public statements that they were not consulted and that the project could aggravate the sector's crisis (Oct. 23–27,	https://muralsonorense.com/advierten-pescadores-de-que-planta-de-licuefaccion-de-amigo-

Empalme		2026)	lng-agravaria-la-crisis-del-sector/

Annex H. Public legal actions in Mexico concerning Amigo LNG and its gas route

Petitioners	Action	Status	Sources
Nuestro Futuro A.C. and Artículo 19 México	Amparo against SEMARNAT and ASEA (consultation and access to information), extended to the ASEA environmental authorization of Apr. 13, 2026 (26SO2025G0143)	Definitive suspension of May 27, 2026 (ASEA barred from issuing any environmental authorization); second definitive suspension of Sept. 18, 2026 (no land or marine works may begin); merits pending	https://expansion.mx/empresas/2026/10/08/amigo-gnl-permisos-suspensiones-proyecto-gas-guaymas-sonora https://www.unotv.com/estados/sonora/juez-federal-en-sonora-frena-proyecto-de-gas-amigo-gnl/
Centro Mexicano de Derecho Ambiental (CEMDA)	Amparo against the environmental evaluation (suspension granted March 2026); incidente de incumplimiento	Oct. 13, 2026: court finds ASEA in non-compliance and orders the authorization declared void; ASEA announced a recurso de queja (Oct. 19–20, 2026)	https://www.excelsior.com.mx/nacional/poder-judicial-ordena-asea-dejar-sin-efecto-autorizacion-ambiental-proyecto-amigo-lng-1 https://www.mexicantimes.com.mx/amigo-lng-guaymas-asea-amparo/
Defensa Ambiental del Noroeste (DAN) and ProDESC	Amparo seeking a strategic environmental assessment of LNG in the Gulf of California, including Amigo LNG	Granted (2026): authorities must issue a new, reasoned response	https://grupoanimal.mx/sociedad/golfo-california-proyectos-gas-licuado-asea-semarnat
Yaqui community of Loma de Bácum	Amparo for lack of consultation against the Guaymas–El Oro pipeline (gas route to Guaymas), 2016	Suspension granted; pipeline out of service since August 2017	https://es.mongabay.com/2018/05/mexico-gasoducto-de-sonora-comunidades-yaqui-violencia/
Communities and organizations (about 25)	Petition to UN Special Rapporteurs (Dec. 2024) concerning Saguaro, Amigo, Vista Pacífico and the Sierra Madre pipeline	Communication from UN Special Rapporteurs to Mexico and to the companies (Sept. 2, 2025)	https://spcommreports.ohchr.org/TMResultsBase/DownLoadPublicCommunicationFile?gId=29864

Annex I. Chronology of the public record

Each entry is drawn from a public document or published report, linked to its source.

Date	Fact	Source
Dec. 8, 2020	DOE Order No. 4629 authorizes Epcilon to export up to 7.8 Mtpa (storage described at 400,000 m³), with exports to commence by December 8, 2027.	https://www.energy.gov/sites/prod/files/2020/12/f81/ord4629.pdf
Sept. 30, 2022	Sonora's state property commission signs a free-of-charge loan (comodato) of about 54 ha in Guaymas, reported to run until Sept. 13, 2027; Epcilon later reports to DOE a 30-year land lease and use permit.	https://www.nmas.com.mx/nmas-focus/politica/contrato-de-comodato-el-mecanismo-que-uso-gobierno-de-sonora-para-dar-terreno-a-amigo-lng/ https://www.energy.gov/sites/default/files/2025-12/Epcilon%20LNG%20LLC%20%28FE%20DOCKET%20NO%20%2020_31_LNG%29%20Request%20for%20Extension%2012122025%20%28003%29.pdf
2025	Mexico's port authority (ASIPONA Guaymas) grants a maritime concession of about 36 ha in Bahía Catalina by direct award (dated July 17, 2025 per Epcilon).	https://www.energy.gov/sites/default/files/2025-12/Epcilon%20LNG%20LLC%20%28FE%20DOCKET%20NO%20%2020_31_LNG%29%20Request%20for%20Extension%2012122025%20%28003%29.pdf
July 2025	World Heritage Committee Decision 47 COM 7A.5 asks Mexico to avoid approving activities that would negatively impact the Gulf of California site.	https://whc.unesco.org/en/decisions/8672/
Sept. 2025	The project's Mexican environmental impact statement describes a 5.1 Mtpa facility and withholds location and layout maps as "reserved information."	https://www.elimparcial.com/son/sonora/2026/06/08/ponen-freno-a-amigo-gnl-en-guaymas-por-irregularidades-en-su-consulta-publica-el-proyecto-planea-exportar-51-millones-de-toneladas-de-gas-licuado-al-ano-poniendo-en-riesgo-el-corredor-de-ballenas-en-sonora/
Oct. 2025	IUCN World Conservation Congress adopts Resolution 8.031 on LNG in the Gulf of California.	https://portals.iucn.org/library/sites/library/files/resrecfiles/WCC_2025_RES_031_EN.pdf
Dec. 12–15, 2025	Epcilon requests (dated Dec. 12, filed Dec. 15) the extension to December 8, 2029; it describes gas supply agreements as "ready for execution" and identifies no pipeline or border crossing.	https://www.energy.gov/sites/default/files/2025-12/Epcilon%20LNG%20LLC%20%28FE%20DOCKET%20NO%20%2020_31_LNG%29%20Request%20for%20Extension%2012122025%20%28003%29.pdf
Jan. 21, 2026	By state decree, Sonora donates about 114 ha ("Paraje Viejo") in the Guaymas industrial fishing park to the Federal Government for the Navy.	https://boletinoficial.sonora.gob.mx/boletin.php?id=142
Jan. 22, 2026	Deadline for comments and interventions in this proceeding; the docket shows no intervenor.	https://public-inspection.federalregister.gov/2025-23764.pdf
Feb. 2026	Cenagas signs a memorandum of understanding with Freedom LNG, of the same group, for a feed-gas pipeline to Guaymas.	https://www.excelsior.com.mx/nacional/sener-anuncia-proyectos-gas-para-guaymas-sonora
Mar. 2026	In CEMDA's amparo, a federal court suspends the environmental evaluation.	https://www.mexicantimes.com.mx/amigo-lng-guaymas-asea-amparo/
Apr. 13, 2026	Date of the ASEA environmental authorization, reportedly capping traffic at about 60 LNG carriers a year and barring marine works from December to April.	https://expansion.mx/empresas/2026/10/08/amigo-gnl-permisos-suspensiones-proyecto-gas-guaymas-sonora
May 20, 2026	ASEA tells the court it has not granted the environmental authorization.	https://expansion.mx/empresas/2026/10/08/amigo-gnl-permisos-suspensiones-proyecto-gas-guaymas-sonora
May 27, 2026	Definitive suspension in the Nuestro Futuro / Artículo 19 amparo bars ASEA from issuing any environmental authorization.	https://articulo19.org/juzgados-de-sonora-dan-suspension-a-autorizacion-de-impacto-ambiental-de-amigo-gnl-hasta-que-se-resuelva-juicio-por-falta-de-acceso-a-informacion-y-participacion-ciudadana/
July 2026	World Heritage Committee Decision 48 COM 7A.44 keeps the Gulf of California on the List of World Heritage in Danger and asks Mexico to "avoid approving any activities that would negatively impact the OUV."	https://whc.unesco.org/en/decisions/9033

July 24, 2026	Epcilon tells DOE the project "has secured all material permits and approvals" in Mexico.	https://www.energy.gov/sites/default/files/2026-07/Epcilon%20LNG%20LLC%20FE%20Docket%2020-31-LNG%20Order%20No%204629%20Extension%20-%20Supplemental%20Information%2007242026.pdf
Sept. 18, 2026	Second definitive suspension: no land or marine works may begin.	https://www.unotv.com/estados/sonora/juez-federal-en-sonora-frena-proyecto-de-gas-amigo-gnl/
Sept. 23, 2026	101 Mexican and international scientists publish a statement against LNG in the Gulf.	https://www.nrdc.org/sites/default/files/2026-09/NRDC_NoLNG_scientists.pdf
Oct. 1, 2026	Epcilon's semi-annual report targets first export on October 1, 2029 and omits the court suspensions.	https://www.energy.gov/sites/default/files/2026-10/Semi%20Annual%20Report%20of%20Epcilon%20LNG%20LLC%20%28FE%20DOCKET%20NO%20%2020_31_LNG%29%20October%202026.pdf
Oct. 6 and 14, 2026	The Government of Sonora calls the contract "alleged" and then says the 2022 contract was "left without legal effect" by later acts it does not identify.	https://www.nmas.com.mx/nmas-focus/politica/durazo-insiste-en-negar-contrato-de-comodato-y-empresa-amigo-lng-lo-reporta-en-eua/ https://indicepolitico.com/gobierno-de-sonora-afirma-que-quedo-sin-efecto-el-comodato-de-54-hectareas-para-planta-de-gas/
Oct. 13, 2026	In CEMDA's amparo, a federal court orders ASEA to declare the environmental authorization void; ASEA announces a recurso de queja.	https://www.excelsior.com.mx/nacional/poder-judicial-ordena-asea-dejar-sin-efecto-autorizacion-ambiental-proyecto-amigo-lng-1
Oct. 18, 2026	In a presentation to Guaymas business owners led by the company's chief executive, a company slide describes storage of 822,000 m³.	https://www.meganoticias.mx/guaymas/noticia/socializan-proyecto-amigo-lng-entre-empresarios-guaymenses/780287
Oct. 21, 2026	Mexico's Energy Secretary states storage of up to 290,000 m³, a 41.7 ha site and up to 60 LNG carriers a year (about 4 percent of existing traffic).	https://tribuna.com.mx/sonora/2026/10/21/gobierno-de-sheinbaum-informa-sobre-planta-amigo-lng-en-guaymas-superficie-almacenamiento-y-buques_704738/
Oct. 21–25, 2026	Sonora state legislators ask state agencies to explain the legality of the free land loan and any broader agreement with the company.	https://dossierpolitico.com/2026/10/25/diputados-de-mc-y-pan-cuestionan-proyecto-de-amigo-lng-de-guaymas-y-exigen-transparentar/
Oct. 23–27, 2026	Fishing cooperatives of Guaymas and Empalme state they have not been consulted since 2021.	https://muralsonorense.com/advierten-pescadores-de-que-planta-de-licuefaccion-de-amigo-lng-agravaria-la-crisis-del-sector/ https://dossierpolitico.com/2026/10/26/se-manifiestan-pescadores-de-guaymas-y-empalme-contra-proyecto-de-licuefaccion-de-gas-natural-amigo-lng/

Annex J. Summary of the public record: World Heritage, opacity and inconsistencies

Each item is documented, with sources, in Sections I and VI and in Annex I.

Topic	What the record shows
World Heritage	All exports would transit a World Heritage Site in Danger; UNESCO asked Mexico (2025, 2026) to avoid approving activities that would harm it.
Ownership	Shareholders and ultimate controllers of every entity undisclosed; the 2020 chart shows 100/90/10% stakes without holders; unnamed "U.S. investor participation"; no change-in-control notice.
Corporate structure	At least nine related entities in the United States, Singapore and Mexico; the Mexican operating company described in at least five ways; one Singapore entity has no public registry record found.
Financing and FID	No lender, export credit agency or equity investor named; FID targets of 2023, 2024, 2025 and 2026 missed; cost estimates of US$2.1–6.8 billion.
Schedule	First-export date moved in nearly every report, to Oct. 1, 2029; the Oct. 2025 report already placed it after the current deadline.
Capacity	7.8 Mtpa before DOE; 5.1 Mtpa in the Mexican environmental impact statement; first train stated at 3.6 to 6 Mtpa.
Storage	400,000 m³ (Order 4629); 225,000 and 450,000 m³ (semi-annual reports); 822,000 m³ (company slide, Oct. 18, 2026); up to 290,000 m³ (Energy Secretary, Oct. 21, 2026).
Vessel traffic	Mexican cap of about 60 carriers a year (≈4.6 Mtpa) versus about 102 carriers needed for 7.8 Mtpa.
Permits	"All material permits" claimed (July 2026) while courts barred the authorization (May 2026) and works (Sept. 2026) and ordered the authorization declared void (Oct. 2026); ASEA told a court in May 2026 it had not granted an authorization dated April 13, 2026.
Land	30-year land right reported to DOE; Sonora contract reported to expire Sept. 13, 2027; State says it has no legal effect; 114 ha in the same park donated to the Federal Government for the Navy (decree of Jan. 21, 2026).
Gas supply	No gas supply contract on DOE's record; the supply plan changed at least four times (2020–2026); the existing pipeline is about 300 MMcf/d short (IEEFA).
Compliance	Five sale and purchase agreements filed 37 to 165 days after execution; July 2026 supplement unsworn.

Annex L. Protected species and habitats of the Gulf of California along the route of the authorized exports

Prepared from public scientific and official sources (IUCN Red List, NOAA Fisheries, CONANP, SEMARNAT, Ramsar, UNESCO and peer-reviewed checklists). Statuses are shown only where confirmed against a source; "—" means not confirmed for this annex. SEMARNAT states that all cetacean species recorded in Mexico are listed in a risk category of NOM-059-SEMARNAT-2010 (semarnat.gob.mx, indicator sheet on cetaceans). Key to overlap with the route: G = Guaymas area; C = central Gulf crossed by carriers; M = Midriff islands, near but north of the direct route; R = route from the Gulf mouth to Guaymas.

Species	Scientific name	IUCN Red List	US status	Overlap	Source
Marine mammal - cetacean					
Vaquita	*Phocoena sinus*	CR	ESA Endangered-Foreign (1985); MMPA	N	[1, 2, 3]
Rough-toothed dolphin	*Steno bredanensis*	—	MMPA	R	[1, 4]
Pacific white-sided dolphin	*Lagenorhynchus obliquidens*	—	MMPA	R	[1, 5]
Risso's dolphin	*Grampus griseus*	—	MMPA	R	[1, 4]
Common bottlenose dolphin	*Tursiops truncatus*	—	MMPA	G, C, M, R	[1, 6, 7]
Pantropical spotted dolphin	*Stenella attenuata*	—	MMPA	R	[1, 4]
Spinner dolphin	*Stenella longirostris*	—	MMPA	R	[1, 4]
Striped dolphin	*Stenella coeruleoalba*	—	MMPA	R	[1, 4]
Common dolphin (short- and long-beaked forms)	*Delphinus delphis (incl. long-beaked form, D. d. bairdii / 'capensis')*	—	MMPA	G, C, M, R	[1, 7, 5]
Melon-headed whale	*Peponocephala electra*	—	MMPA	R	[1, 4]
False killer whale	*Pseudorca crassidens*	NT	ESA: only Main Hawaiian Islands Insular DPS listed (Endangered); Gulf animals not ESA-listed; MMPA	C, R	[1, 8, 9]
Killer whale (orca)	*Orcinus orca*	DD	ESA: only Southern Resident DPS listed (not Gulf); MMPA	C, M, R	[1, 10, 11]
Short-finned pilot whale	*Globicephala macrorhynchus*	—	MMPA	G, C, M, R	[1, 7, 11]
Baird's beaked whale	*Berardius bairdii*	—	MMPA	C, R	[1, 4]
Pygmy beaked whale	*Mesoplodon peruvianus*	—	MMPA	G	[1, 4]
Cuvier's beaked whale	*Ziphius cavirostris*	—	MMPA	C, R	[1, 4]
Pygmy sperm whale	*Kogia breviceps*	—	MMPA	R	[1, 4]
Dwarf sperm whale	*Kogia sima*	—	MMPA	R	[1, 4]
Sperm whale	*Physeter macrocephalus*	VU	ESA Endangered (throughout range); MMPA	C, R	[1, 12, 13]
Gray whale	*Eschrichtius robustus*	—	ESA: only Western North Pacific DPS listed (Endangered); Eastern North Pacific stock not listed; MMPA	R	[1, 6, 5]
Humpback whale	*Megaptera novaeangliae*	LC	ESA: Mexico DPS Threatened; Central America DPS Endangered;	R	[1, 6, 14]

			MMPA		
Common minke whale	*Balaenoptera acutorostrata*	—	MMPA	C, M	[1, 4]
Sei whale	*Balaenoptera borealis*	EN	ESA Endangered; MMPA	R	[1, 15, 13]
Bryde's whale	*Balaenoptera edeni (B. brydei)*	—	Not ESA-listed in Pacific (ESA-listed Rice's whale is Gulf of Mexico only); MMPA	C, M, R	[1, 6, 13]
Blue whale	*Balaenoptera musculus*	EN	ESA Endangered; MMPA	C, R	[1, 6, 16]
Fin whale	*Balaenoptera physalus*	VU	ESA Endangered; MMPA	G	[1, 6, 17]
Marine mammal - pinniped					
California sea lion	*Zalophus californianus*	LC	MMPA (not ESA-listed)	G, C, M, R	[1, 18, 7]
Guadalupe fur seal	*Arctocephalus townsendi*	LC	ESA Threatened (1985); MMPA (depleted)	G	[1, 19, 9]
Northern elephant seal	*Mirounga angustirostris*	—	MMPA	R	[1]
Harbor seal	*Phoca vitulina richardii*	—	MMPA	R	[1]
Other					
Fish-eating bat	*Myotis vivesi*	—	—	G, M	[7]
Sea turtles					
Leatherback turtle	*Dermochelys coriacea*	—	ESA Endangered (throughout range)	R	[20, 21]
Loggerhead turtle	*Caretta caretta*	—	ESA North Pacific Ocean DPS Endangered	R	[22, 21]
Green turtle (East Pacific 'black' turtle)	*Chelonia mydas (C. agassizii)*	Global: reclassified EN to LC at IUCN Congress, Oct 2025	ESA East Pacific DPS Threatened	G	[5, 23, 24]
Olive ridley turtle	*Lepidochelys olivacea*	VU	ESA: Mexico's Pacific coast breeding populations Endangered; all others Threatened	R, C	[25, 21]
Fish, sharks and rays					
Totoaba	*Totoaba macdonaldi*	VU	—	M, C	[26, 3, 27]
Whale shark	*Rhincodon typus*	EN	Not ESA-listed	C, M, R	[28, 29]
Giant (oceanic) manta ray	*Mobula birostris*	EN	ESA Threatened (2018)	R	[30, 9, 31]
Scalloped hammerhead	*Sphyrna lewini*	CR	ESA Eastern Pacific DPS Endangered	C, R	[32, 13]
Smooth hammerhead	*Sphyrna zygaena*	VU	Not ESA-listed	R, C	[33, 13]
White shark	*Carcharodon carcharias*	VU	Not ESA-listed (NE Pacific)	M, C	[34, 5, 29]
Gulf grouper	*Mycteroperca jordani*	EN	ESA Endangered-Foreign (2016)	G, C, M, R	[35, 9, 36]
Pacific (giant) seahorse	*Hippocampus ingens*	VU	—	G, C, R	[37]
Seabirds					

Heermann's gull	*Larus heermanni*	NT	—	M	[38, 18, 39]
Elegant tern	*Thalasseus elegans (Sterna elegans)*	NT	—	M	[38, 40]
Royal tern	*Thalasseus maximus*	—	—	M	[38]
Yellow-footed gull	*Larus livens*	—	—	G, C, M, R	[38, 18, 11]
Blue-footed booby	*Sula nebouxii*	—	—	G	[18, 39]
Brown booby	*Sula leucogaster*	—	—	M, C, R	[18]
Brown pelican (California subspecies)	*Pelecanus occidentalis californicus*	—	—	G, C, M, R	[18, 11, 41]
Craveri's murrelet	*Synthliboramphus craveri*	VU	—	M, C, R	[42, 43, 18]
Black-vented shearwater	*Puffinus opisthomelas*	NT	—	R	[44, 45]
Pink-footed shearwater	*Ardenna creatopus*	VU	—	R	[46]
Black storm-petrel	*Hydrobates (Oceanodroma) melania*	—	—	M, C	[39]
Red-billed tropicbird	*Phaethon aethereus*	—	—	M, C	[18]

Protected habitats near Guaymas and along the route

Area	Designation	Overlap	Source
Guaymas Basin hydrothermal vents	Federal marine protected area (Santuario), decreed June 2009; 1,455.65 km2 (with East Pacific Rise vents)	C, R	[47, 48]
Estero El Soldado	Ramsar site 1982 (2 Feb 2011), 349.9 ha; state Zona Sujeta a Conservación Ecológica since 2006	G	[49]
Bahía Guásimas - Estero Lobos lagoon complex	Ramsar site 1790 (2008), 135,197.5 ha; WHSRN site (Bahía de Lobos)	G, R	[7, 50]
Isla San Pedro Mártir	Ramsar site (2 Feb 2004, 301.65 km2); UNESCO component 1182-003	M	[18, 51]
Isla Rasa	Ramsar site (2 Feb 2006, 66 ha); APFF Islas del Golfo de California (UNESCO 1182-001)	M	[38, 52]
Isla San Esteban and other Midriff sea lion rookeries	APFF Islas del Golfo de California (UNESCO 1182-001)	M	[1, 42]
Canal de Ballenas / Bahía de los Ángeles (Midriff)	within Gulf of California IMMA	M	[6, 17]
Bahía de Loreto National Park	National Park; Ramsar site (2 Feb 2004, 2,065.81 km2); UNESCO component 1182-005	C	[11, 6]
Archipiélago de San Lorenzo National Park	UNESCO component 1182-010bis	M	[51]
Islands and Protected Areas of the Gulf of California (World Heritage)	UNESCO World Heritage property 1182 (inscribed 2005; criteria vii, ix, x); on List of World Heritage in Danger since 2019; 244 islands/islets plus 9 coastal-marine protected areas; 1,837,194 ha	G, C, M, R	[39, 27]
UNESCO components at the Gulf mouth	Cabo Pulmo (1182-006), Cabo San Lucas (1182-007), Islas Marías (1182-008), Isla Isabel (1182-009), Islas Marietas (1182-011bis), Balandra (1182-012ter); also El Vizcaíno Gulf coastal belt (1182-004) and Upper Gulf-Colorado Delta (1182-002)	R	[51, 27]
Humedales de Yavaros-Moroncarit	Ramsar site (2 Feb 2010, 136.27 km2)	R	[52, 1]

Bahía de La Paz / Espíritu Santo	Ramsar Humedales El Mogote-Ensenada de La Paz (2008; 91.84 km2); Balandra (UNESCO 1182-012ter)	R	[6, 1]
Gulf of California Important Marine Mammal Area	IMMA (IUCN Marine Mammal Protected Areas Task Force)	G, C, M, R	[6]

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Annex M. Key texts: World Heritage Convention, World Heritage Committee decisions, IUCN Resolution 8.031 and US law

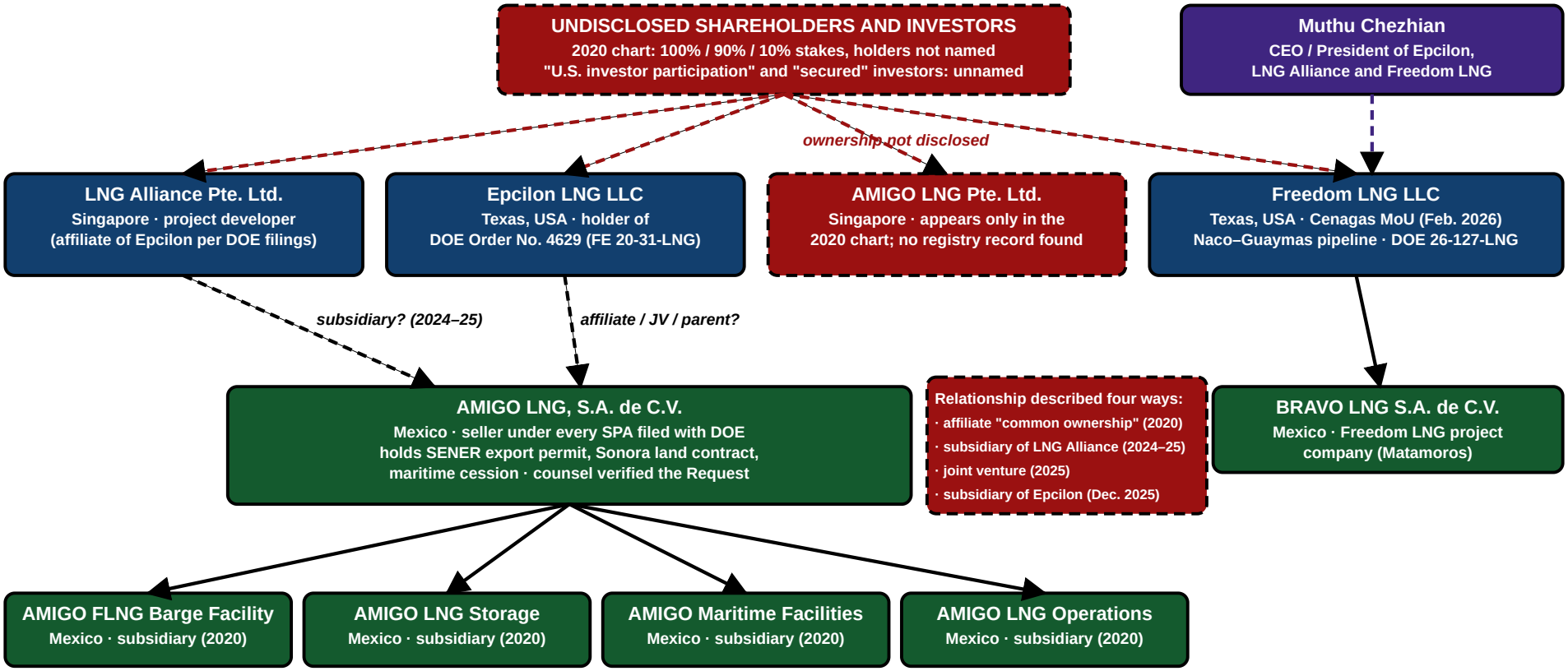
Short excerpts from the official texts, each with its source.

Instrument	Text	Source
World Heritage Convention (1972), Preamble	Parts of the heritage "are of outstanding interest and therefore need to be preserved as part of the world heritage of mankind as a whole."	https://whc.unesco.org/en/conventiontext/
Convention, Art. 6(1)	Such heritage "constitutes a world heritage" which "the international community as a whole" has a duty to protect by co-operating, while fully respecting the sovereignty of the State where it is located.	https://whc.unesco.org/en/conventiontext/
Convention, Art. 6(3)	"Each State Party to this Convention undertakes not to take any deliberate measures which might damage directly or indirectly the cultural and natural heritage referred to in Articles 1 and 2 situated on the territory of other States Parties to this Convention."	https://whc.unesco.org/en/conventiontext/
Convention, Art. 11(4)	The Committee keeps a "List of World Heritage in Danger" of listed property "threatened by serious and specific dangers."	https://whc.unesco.org/en/conventiontext/
States Parties	United States: ratified December 7, 1973, the first State to do so. Mexico: State Party since February 23, 1984.	https://whc.unesco.org/en/statesparties/us
Decision 29 COM 8B.9 (2005)	Inscription of the Islands and Protected Areas of the Gulf of California; the property now meets criteria (vii), (ix) and (x).	https://whc.unesco.org/en/list/1182/
Decision 43 COM 7B.26 (2019)	"Decides to inscribe the Islands and Protected Areas of the Gulf of California (Mexico) on the List of World Heritage in Danger."	https://whc.unesco.org/en/decisions/7490
Decision 47 COM 7A.5 (2025), para. 13	Requests details of the proposed gas development, "which would include the transportation of extracted gas in the vicinity of the property," an impact assessment before any decision difficult to reverse, and "to avoid approving any activities that would negatively impact the OUV."	https://whc.unesco.org/en/decisions/8672/
Decision 48 COM 7A.44 (2026), para. 10	Takes note that natural gas infrastructure projects in the northwest of the country "remain suspended due to legal challenges," and that Mexico will inform the World Heritage Centre of possible impacts on the OUV.	https://whc.unesco.org/en/decisions/9033
Decision 48 COM 7A.44 (2026), para. 11	Notes "with concern" third-party concerns about "an alleged planned expansion of several liquefied natural gas (LNG) projects in the vicinity of the property," and requests Mexico to provide details of such projects, to assess their impacts "before making any decision that would be difficult to reverse," and to "avoid approving any activities that would negatively impact the OUV."	https://whc.unesco.org/en/decisions/9033
Decision 48 COM 7A.44 (2026), paras. 12–13	Next state of conservation report due February 1, 2027; "Decides to retain" the property "on the List of World Heritage in Danger."	https://whc.unesco.org/en/decisions/9033
Mexico, state of conservation report (Jan. 2026)	The processes associated with the gas project "remain suspended due to various legal challenges."	https://whc.unesco.org/document/224542
IUCN Resolution 8.031 (Oct. 2025)	"CALLS ON the Governments of Mexico and the United States of America to ensure the implementation of the precautionary principle, to oppose and, where necessary, reconsider actions permitting LNG industrialisation" of the Gulf of California.	https://portals.iucn.org/library/sites/library/files/resrecfiles/WCC_2025_RES_031_EN.pdf
54 U.S.C. § 307101(e) (NHPA § 402)	"Prior to the approval of any undertaking outside the United States that may directly and adversely affect a property that is on the World Heritage List … the head of a Federal agency having direct or indirect jurisdiction over the undertaking shall take into account the effect of the undertaking on the property for purposes of avoiding or mitigating any adverse effect."	https://www.govinfo.gov/link/uscode/54/307101
54 U.S.C. § 300320	"Undertaking" means "a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency," including those "requiring a Federal permit, license, or approval."	https://www.govinfo.gov/link/uscode/54/300320

National Park Service, Q&A on the earlier US withdrawal from UNESCO	"While the Convention's Secretariat is staffed by UNESCO, the Convention is a stand-alone international legal instrument."	https://www.nps.gov/subjects/internationalcooperation/unesco-q-a.htm

Annex K. Organizational chart of entities associated with Amigo LNG

FE Docket No. 20-31-LNG · Compiled solely from public records (DOE docket, Mexican authorities, company announcements, press). Ownership links shown only where the record states them.



Permits, land rights and contracts attributed to AMIGO LNG, S.A. de C.V. (per Epcilon filings and press)

SENER export permit Sept. 26, 2024	**Sonora land contract (comodato)** ~54 ha · Sept. 2022 · "no legal effect" (Oct. 2026)	**Maritime cession (ASIPONA)** about 36 ha of sea · July 17, 2025
ASEA environmental authorization Apr. 13, 2026 · holder "Amigo LNG" · suspended	**CNE liquefaction and storage permits** May 2026 · numbers not published	**LNG sale and purchase agreements** OQ · Sahara · Gunvor · Macquarie · IRH

Contractors: Drydocks World (EPC, floating units) · COMSA Marine (marine works) · Technip Energies (project management) · Honeywell. NO LENDER OR FINANCIER NAMED.

Red dashed boxes: undisclosed or unverified. Dashed arrows: relationship not established in the record.

Annex K (continued). Trace of entities and sources

Entity	Jurisdiction, role and officers	Public source
Epcilon LNG LLC	Texas LLC; authorization holder; President: M. Chezhian	DOE application, Mar. 20, 2020 (energy.gov/sites/prod/files/2020/04/f73/20-31-LNG.pdf); Order No. 4629
LNG Alliance Pte. Ltd.	Singapore; project developer and affiliate of Epcilon; CEO: M. Chezhian	DOE application 2020; company press releases
AMIGO LNG Pte. Ltd.	Singapore; shown in 2020 organizational chart; no public registry record located	DOE application 2020, Attachment 2
AMIGO LNG, S.A. de C.V.	Mexico; seller under all SPAs filed with DOE; holder of SENER export permit, comodato and maritime cession; counsel verified Request	DOE contract filings (2025–2026); Request of Dec. 12, 2025; semi-annual reports
AMIGO FLNG Barge Facility / LNG Storage / Maritime Facilities / LNG Operations	Mexican subsidiaries of AMIGO LNG named in 2020; current status not public	DOE application 2020
Freedom LNG LLC	Texas LLC; Cenagas MoU (Feb. 2026); own DOE application FE 26-127-LNG; President: M. Chezhian	Excélsior, Feb. 2026; DOE docket 26-127-LNG
BRAVO LNG S.A. de C.V.	Mexico; Freedom LNG project company (Matamoros)	DOE docket 26-127-LNG

Not found in any public record: the shareholders, percentages, directors (other than the chief executive) and ultimate beneficial owners of any of these entities, and any lender, export credit agency or named equity investor.